

GEKP

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

19 4923

## DESIGNATION FORM

(to be used by counsel or pro se plaintiff to indicate the category of the case for the purpose of assignment to the appropriate calendar)

Address of Plaintiff: 1659 Ramble Road, Langhorne, PA 19047

Address of Defendant:

Place of Accident, Incident or Transaction: Bucks

## RELATED CASE, IF ANY:

Case Number: 19-4851 Judge: Proctor Date Terminated:

Civil cases are deemed related when **Yes** is answered to any of the following questions:

- |  |                              |                             |
|--|------------------------------|-----------------------------|
| 1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court?  | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| 2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court?            | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| 3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action of this court? | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| 4. Is this case a second or successive habeas corpus, social security appeal, or pro se civil rights case filed by the same individual?  | Yes <input type="checkbox"/> | No <input type="checkbox"/> |

I certify that, to my knowledge, the within case ☐ is / ☐ is not related to any case now pending or within one year previously terminated action in this court except as noted above.DATE: 10/21/2019  
 \_\_\_\_\_  
 Attorney-at-Law / Pro Se Plaintiff  
 \_\_\_\_\_  
 Attorney I.D. # (if applicable)CIVIL: (Place a  $\checkmark$  in one category only)

## A. Federal Question Cases:

- ☐ 1. Indemnity Contract, Marine Contract, and All Other Contracts  
☐ 2. FELA  
☐ 3. Jones Act-Personal Injury  
☐ 4. Antitrust  
☐ 5. Patent  
☐ 6. Labor-Management Relations  
☒ 7. Civil Rights 555  
☐ 8. Habeas Corpus  
☐ 9. Securities Act(s) Cases  
☐ 10. Social Security Review Cases  
☐ 11. All other Federal Question Cases  
 (Please specify): \_\_\_\_\_

## B. Diversity Jurisdiction Cases:

- ☐ 1. Insurance Contract and Other Contracts  
☐ 2. Airplane Personal Injury  
☐ 3. Assault, Defamation  
☐ 4. Marine Personal Injury  
☐ 5. Motor Vehicle Personal Injury  
☐ 6. Other Personal Injury (Please specify): \_\_\_\_\_  
☐ 7. Products Liability  
☐ 8. Products Liability - Asbestos  
☐ 9. All other Diversity Cases  
 (Please specify): \_\_\_\_\_

## ARBITRATION CERTIFICATION

(The effect of this certification is to remove the case from eligibility for arbitration.)

I, \_\_\_\_\_, counsel of record or pro se plaintiff, do hereby certify:

☐ Pursuant to Local Civil Rule 53.2, § 3(c) (2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs:

☐ Relief other than monetary damages is sought.
DATE: \_\_\_\_\_  
 \_\_\_\_\_  
 Attorney-at-Law / Pro Se Plaintiff  
 \_\_\_\_\_  
 Attorney I.D. # (if applicable)

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

GEKP

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**CASE MANAGEMENT TRACK DESIGNATION FORM**

Edwards

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:  
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:

CIVIL ACTION

v.

NO. **19 4923**

Bucks County Correctional Facility

In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a Case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See § 1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a Case Management Track Designation Form specifying the track to which that defendant believes the case should be assigned.

**SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:**

- (a) Habeas Corpus – Cases brought under 28 U.S.C. § 2241 through § 2255. ☐
- (b) Social Security – Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits. ☐
- (c) Arbitration – Cases required to be designated for arbitration under Local Civil Rule 53.2. ☐
- (d) Asbestos – Cases involving claims for personal injury or property damage from exposure to asbestos. ☐
- (e) Special Management – Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases. ☐
- (f) Standard Management – Cases that do not fall into any one of the other tracks. **555** ☒

OCT 21 2019

Date

Daniel Mc Ginnis

Deputy Clerk

\_\_\_\_\_  
Attorney for\_\_\_\_\_  
Telephone\_\_\_\_\_  
FAX Number\_\_\_\_\_  
E-Mail Address

GEKP

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA

GERALD EDWARDS

(In the space above enter the full name(s) of the plaintiff(s).)

19 4923

- against -

BLUES COUNTY  
CORRECTIONAL FACILITY

**COMPLAINT**

Jury Trial: ☐ Yes ☐ No

(check one)

(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Part I. Addresses should not be included here.)

**I. Parties in this complaint:**

- A. List your name, address and telephone number. If you are presently in custody, include your identification number and the name and address of your current place of confinement. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff	Name	_____
	Street Address	_____
	County, City	_____
	State & Zip Code	_____
	Telephone Number	_____

- B. List all defendants. You should state the full name of the defendants, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant can be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant No. 1

Name BUCKS COUNTY CORRECTIONAL  
 Street Address 611 RT FACILITY  
 County, City DOYLESTOWN  
 State & Zip Code PA 17901

Defendant No. 2

Name \_\_\_\_\_  
 Street Address \_\_\_\_\_  
 County, City \_\_\_\_\_  
 State & Zip Code \_\_\_\_\_

Defendant No. 3

Name \_\_\_\_\_  
 Street Address \_\_\_\_\_  
 County, City \_\_\_\_\_  
 State & Zip Code \_\_\_\_\_

Defendant No. 4

Name \_\_\_\_\_  
 Street Address \_\_\_\_\_  
 County, City \_\_\_\_\_  
 State & Zip Code \_\_\_\_\_

## II. Basis for Jurisdiction:

Federal courts are courts of limited jurisdiction. Only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount in damages is more than \$75,000 is a diversity of citizenship case.

- A. What is the basis for federal court jurisdiction? (check all that apply)

☐ Federal Questions ☐ Diversity of Citizenship

- B. If the basis for jurisdiction is Federal Question, what federal Constitutional, statutory or treaty right is at issue? \_\_\_\_\_

C. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party?

Plaintiff(s) state(s) of citizenship \_\_\_\_\_

Defendant(s) state(s) of citizenship \_\_\_\_\_

**III. Statement of Claim:**

State as briefly as possible the facts of your case. Describe how each of the defendants named in the caption of this complaint is involved in this action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

A. Where did the events giving rise to your claim(s) occur? BUCKS COUNTY  
CORRECTIONAL FACILITY 4/3/19 to 4/8/19 SEE ATTACH

B. What date and approximate time did the events giving rise to your claim(s) occur? 4/3/19 14/8/19

What happened to you?

C. Facts: did not get medical treatment, Had 2 infected teeth. They never gave me inhalers. I never seen a doctor. Told nurse when I arrived about my condition dizzy spells emphysema teeth

Who did what?

Was anyone else involved?

Who else saw what happened?

**IV. Injuries:**

If you sustained injuries related to the events alleged above, describe them and state what medical treatment, if any, you required and received. \_\_\_\_\_

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**V. Relief:**

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking, and the basis for such compensation.

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I declare under penalty of perjury that the foregoing is true and correct.

Signed this 18 day of Oct., 2019.

Signature of Plaintiff Ned Clark  
Mailing Address 1659 RAMBLE RD  
LANGHORNE  
PA 19047  
Telephone Number 267 981 0709  
Fax Number (if you have one) \_\_\_\_\_  
E-mail Address \_\_\_\_\_

**Note:** All plaintiffs named in the caption of the complaint must date and sign the complaint. Prisoners must also provide their inmate numbers, present place of confinement, and address.

**For Prisoners:**

I declare under penalty of perjury that on this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, I am delivering this complaint to prison authorities to be mailed to the Clerk's Office of the United States District Court for the Eastern District of Pennsylvania.

Signature of Plaintiff: \_\_\_\_\_  
Inmate Number \_\_\_\_\_

**Gerald Edwards**

**v.**

**Bucks County**

**Correctional Facility**

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I Gerald Edwards the plaintiff am filing in title u.s. 42-1983.In u.s. court  
Easten Division Philadelphia Pa.In case no. cp-09-sa-0000318.



Now comes Gerald Edwards as the plaintiff in the case of cp-09-sa-0000318-2019 and cp-09-sa-0000104.

I was sent to Bucks County Correctional facility in Doylestown pa.18901 for some thing I had noting to do whit.

When I was there they refused me medicl treatment.I was suffering from 2 infected teeth. I told the nurse at the admitting place or intake center that I was having dizzy spells also over the past few weeks.And that I also suffer from emphysema. I also told the nurse that I some oxygen and inhalers.

When I was in the cell I filled every day paper work request tosee a doctor and a dentists.I never sean one.I have included medical records and records from E.R. room,Dr. and jail.After I got out.see attach.

As for the case against me I'll sent along some of the transcripts.here is what happen.The constable Jim McMeeking pick me up and took me to the magistrate Daniel Baranoski.he said he had a warrant.so I ask for it he never showed it.got to the magistrate court and ask for a warrant he did'nt have one.In fact the both of them never ask for ID of me ether.The only thing Daniel Baranoski said to me was enter a plea or go to jail.so I enter a plea and whet to jail any way.And he also got a \$100.00 of of me.Here I was denied due process.

At trail i try to file motions and briefs in my defense but as you can see in the transcripts the judge Clyde W. Waite denied it.He also said,on page 10 it was some kind of a circus.also 10 thought 16 the objections were raised in defense in the case.see attach.On page 20 the judge was in a hurry as to the time the trial was taking.On page 24 the issue was raised who owns the property though 30.Mr Freed the city attorney does not even have the deed to property that they can't seam to find on the map of the Neshamey Park. They could not even find the

geographic location. As for the construction of a road as in 36 thought 39 judge and witness discussing on the stand about building a road, for which had nothing to do in case. This is truly a due process violation.

As you can see in cp-09-sa-0000401-2019 they just sent a long the payment determination notice. They just wanted me to pay and move a long. Even Mr Freed said I should pay and get it over with, that the city attorney.

As I'm 75 years and in poor health. I have been subjected to undue hardship physically and emotionally and money wise.

This is fraud perpetrated on me.

I move the court for equitable relief.

I ask the court for \$500,00.00

## court lacks authority

It is clear the the Middletown township had no authority to operate or mandate of law and was the for whit out authority to bring this case against me.now there is a denial of due process. The constitution states only one command twice. The fifth amendment says to the federal government that no one shall be deprived of life property whit out due process of law. The fourteenth amendment uses the same thing.Its the due [process clause to describe a legal obligation of all states.These are the assurance that all american goverment must operate whit in the legality and provide fair procedurse .. Commonwealth of pennaylvania,constitution.Article 3 (legislation) one throught twelve.Describes how law is passed.and the constitution dose not give authority to any one else to do so, only the state legislation.

Pennsylvania Code (Last Updated: April 5, 2016)  
 Title 234. RULES OF CRIMINAL PROCEDURE  
 Chapter 5. PRETRIAL PROCEDURES IN COURT  
 CASES

**Section 504. Contents of Complaint**

*Latest version.*

Every complaint shall contain:

- (1) the name of the affiant;
- (2) the name and address of the defendant, or if unknown, a description of the defendant as nearly as may be;
- (3) a direct accusation to the best of the affiant's knowledge, or information and belief, that the defendant violated the penal laws of the Commonwealth of Pennsylvania;
- (4) the date when the offense is alleged to have been committed; provided, however:
  - (a) if the specific date is unknown, or if the offense is a continuing one, it shall be sufficient to state that it was committed on or about any date within the period of limitations; and
  - (b) if the date or day of the week is an essential element of the offense charged, such date or day must be specifically set forth;
- (5) the place where the offense is alleged to have been committed;
- (6) (a) in a court case, a summary of the facts sufficient to advise the defendant of the nature of the offense charged, but neither the evidence nor the statute allegedly violated need be cited in the complaint. However, a citation of the statute allegedly violated, by itself, shall not be sufficient for compliance with this subsection; or
  - (b) in a summary case, a citation of the specific section and subsection of the statute or ordinance allegedly violated, together with a summary of the facts sufficient to advise the defendant of the nature of the offense charged;
- (7) a statement that the acts of the defendant were against the peace and dignity of the Commonwealth of Pennsylvania or in violation of an ordinance of a political subdivision;

## DISCUSSION

### **A. Wrongful Use of Civil Proceedings vs. Abuse of Process**

In the instant matter, Plaintiffs have brought causes of action against all Defendants for both abuse of process and wrongful use of civil proceedings (also referred to as malicious prosecution). The torts of malicious prosecution and abuse of process are separate and distinct.

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Broadwater v. Sentner, 725 A.2d 779, 782, 1999 Pa. Super. 24 (1999). The plaintiff must also prove that the prior proceedings terminated in its favor and against the Dragonetti action defendant. Id.

Conversely, “abuse of process is, in essence, the use of legal process as a tactical weapon to coerce a desired result that is not the legitimate object of the process.” McGee v. Feege, 517 Pa. 247, 259, 535 A.2d 1020, 1026 (1987); Shiner v. Moriarty, 706 A.2d 1228, 1236 (Pa. Super. 1998); Rosen v. Am. Bank of Koffa, 426 Pa. Super. 376, 627 A.2d 190, 192 (1993). To establish a claim for abuse of process, plaintiff must demonstrate that defendant: (1) used a legal process against the plaintiff, (2) primarily to accomplish a purpose for which the process was not designed; and that (3) harm has been caused to the plaintiff. Id. This tort differs from that of wrongful use of civil proceedings insofar as the gravamen of an abuse of process claim is the “perversion of legal process” in order to achieve a purpose which is not an authorized goal of the procedure in question. Werner, 2002 Pa. Super. at 42; Rosen, 627 A.2d at 192.

The inquiry at bar is whether Plaintiffs have set forth material, relevant, well-pleaded facts which, if true, state claims against Defendants, or any of them, for wrongful use of civil proceedings and/or abuse of process. However, Plaintiffs have failed to state a cause of action with respect to either claim. Each will be addressed in turn.

### **B. Plaintiffs Have Failed to State A Claim for Wrongful Use of Civil Proceedings**

## **234 Rule 122**

## **CRIMINAL PROCEDURE**

### *Committee Explanatory Reports:*

Final Report explaining the March 1, 2000 reorganization and renumbering of the rules published with the Court's Order at 30 Pa.B. 1478 (March 18, 2000).

Final Report explaining the December 19, 2007 changes to paragraph (A) concerning areas of inquiry for waiver colloquy published with the Court's Order at 38 Pa.B. 62 (January 5, 2008).

Final Report explaining the March 29, 2011 changes to the Comment adding citations to recent case law concerning right to counsel, time for withdrawal of waiver, and forfeiture of right to counsel published with the Court's Order at 41 Pa.B. 2000 (April 16, 2011).

### **Source**

The provisions of this Rule 121 amended December 19, 2007, effective February 1, 2008, 38 Pa.B. 61; amended March 29, 2011, effective May 1, 2011, 41 Pa.B. 1999. Immediately preceding text appears at serial pages (332091) to (332092) and (348259).

## **Rule 122. Appointment of Counsel.**

### **(A) Counsel shall be appointed:**

(1) in all summary cases, for all defendants who are without financial resources or who are otherwise unable to employ counsel when there is a likelihood that imprisonment will be imposed;

(2) in all court cases, prior to the preliminary hearing to all defendants who are without financial resources or who are otherwise unable to employ counsel;

(3) in all cases, by the court, on its own motion, when the interests of justice require it.

### **(B) When counsel is appointed,**

(1) the judge shall enter an order indicating the name, address, and phone number of the appointed counsel, and the order shall be served on the defendant, the appointed counsel, the previous attorney of record, if any, and the attorney for the Commonwealth pursuant to Rule 114 (Orders and Court Notices: Filing; Service; and Docket Entries); and

(2) the appointment shall be effective until final judgment, including any proceedings upon direct appeal.

(C) A motion for change of counsel by a defendant for whom counsel has been appointed shall not be granted except for substantial reasons.

### **Comment**

This rule is designed to implement the decisions of *Argersinger v. Hamlin*, 407 U.S. 25 (1972), and *Coleman v. Alabama*, 390 U.S. 1 (1970), that no defendant in a summary case be sentenced to

### **Rule 513. Requirements for Issuance; Dissemination of Arrest Warrant Information.**

(A) For purposes of this rule, “arrest warrant information” is defined as the criminal complaint in cases in which an arrest warrant is issued, the arrest warrant, any affidavit(s) of probable cause, and documents or information related to the case.

#### **(B) ISSUANCE OF ARREST WARRANT**

(1) In the discretion of the issuing authority, advanced communication technology may be used to submit a complaint and affidavit(s) for an arrest warrant and to issue an arrest warrant.

(2) No arrest warrant shall issue but upon probable cause supported by one or more affidavits sworn to before the issuing authority in person or using advanced communication technology. The issuing authority, in determining whether probable cause has been established, may not consider any evidence outside the affidavits.

(3) Immediately prior to submitting a complaint and affidavit to an issuing authority using advanced communication technology, the affiant must personally communicate with the issuing authority in person, by telephone, or by any device which allows for simultaneous audio-visual communication. During the communication, the issuing authority shall verify the identity of the affiant, and orally administer an oath to the affiant. In any telephonic communication, if the issuing authority has a concern regarding the identity of the affiant, the issuing authority may require the affiant to communicate by a device allowing for two-way simultaneous audio-visual communication or may require the affiant to appear in person.

(4) At any hearing on a motion challenging an arrest warrant, no evidence shall be admissible to establish probable cause for the arrest warrant other than the affidavits provided for in paragraph (B)(2).

#### **(C) DELAY IN DISSEMINATION OF ARREST WARRANT INFORMATION**

The affiant or the attorney for the Commonwealth may request that the availability of the arrest warrant information for inspection and dissemination be delayed. The arrest warrant affidavit shall include the facts and circumstances that are alleged to establish good cause for delay in inspection and dissemination.

(1) Upon a finding of good cause, the issuing authority shall grant the request and order that the availability of the arrest warrant information for inspection and dissemination be delayed for a period of 72 hours or until receipt of notice by the issuing authority that the warrant has been executed, whichever occurs first. The 72-hour period of delay may be preceded by an initial delay period of not more than 24 hours, when additional time is required to complete the administrative processing of the arrest warrant information before the arrest warrant is issued. The issuing authority shall complete the administrative processing of the arrest warrant information prior to the expiration of the initial 24-hour period.

(2) Upon the issuance of the warrant, the 72-hour period of delay provided in paragraph (C)(1) begins.



(3) In those counties in which the attorney for the Commonwealth requires that complaints and arrest warrant affidavits be approved prior to filing as provided in Rule 507, only the attorney for the Commonwealth may request a delay in the inspection and dissemination of the arrest warrant information.

### Comment

This rule was amended in 2013 to add provisions concerning the delay in inspection and dissemination of arrest warrant information. Paragraph (A) provides a definition of the term “arrest warrant information” that is used throughout the rule. Paragraph (B) retains the existing requirements for the issuance of arrest warrants. Paragraph (C) establishes the procedures for a temporary delay in the inspection and dissemination of arrest warrant information prior to the execution of the warrant.

### ISSUANCE OF ARREST WARRANTS

Paragraph (B)(1) recognizes that an issuing authority either may issue an arrest warrant using advanced communication technology or order that the law enforcement officer appear in person to apply for an arrest warrant.

This rule does not preclude oral testimony before the issuing authority, but it requires that such testimony be reduced to an affidavit prior to issuance of a warrant. All affidavits in support of an application for an arrest warrant must be sworn to before the issuing authority prior to the issuance of the warrant. The language “sworn to before the issuing authority” contemplates, when advanced communication technology is used, that the affiant would not be in the physical presence of the issuing authority. *See* paragraph (B)(3).

All affidavits and applications filed pursuant to this rule are public records. However, in addition to restrictions placed by law and rule on the disclosure of confidential information, the filings required by this rule are subject to the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania* and may require further precautions, such as placing certain types of information in a “Confidential Information Form” or providing both a redacted and unredacted version of the filing. *See* Rule 113.1.

This rule carries over to the arrest warrant the requirement that the evidence presented to the issuing authority be reduced to writing and sworn to, and that only the writing is subsequently admissible to establish that there was probable cause. In these respects, the procedure is similar to that applicable to search warrants. *See* Rule 203. For a discussion of the requirement of probable cause for the issuance of an arrest warrant, *see Commonwealth v. Flowers*, 369 A.2d 362 (Pa. Super. 1976).

The affidavit requirements of this rule are not intended to apply when an arrest warrant is to be issued for noncompliance with a citation, with a summons, or with a court order.

An affiant seeking the issuance of an arrest warrant, when permitted by the issuing authority, may use advanced communication technology as defined in Rule 103.

When advanced communication technology is used, the issuing authority is required by this rule to (1) determine that the evidence contained in the affidavit(s) establishes probable cause, and (2) verify the identity of the affiant.

Verification methods include, but are not limited to, a “call back” system, in which the issuing authority would call the law enforcement agency or police department that the affiant indicates is the entity seeking the warrant; a “signature comparison” system whereby the issuing authority would



## **Rule 504. Contents of Complaint.**

Every complaint shall contain:

- (1) the name of the affiant;
- (2) the name and address of the defendant, or if unknown, a description of the defendant as nearly as may be;
- (3) a direct accusation to the best of the affiant's knowledge, or information and belief, that the defendant violated the penal laws of the Commonwealth of Pennsylvania;
- (4) the date when the offense is alleged to have been committed; provided, however:
  - (a) if the specific date is unknown, or if the offense is a continuing one, it shall be sufficient to state that it was committed on or about any date within the period of limitations; and
  - (b) if the date or day of the week is an essential element of the offense charged, such date or day must be specifically set forth;
- (5) the place where the offense is alleged to have been committed;
- (6)
  - (a) in a court case, a summary of the facts sufficient to advise the defendant of the nature of the offense charged, but neither the evidence nor the statute allegedly violated need be cited in the complaint. However, a citation of the statute allegedly violated, by itself, shall not be sufficient for compliance with this subsection; or
  - (b) in a summary case, a citation of the specific section and subsection of the statute or ordinance allegedly violated, together with a summary of the facts sufficient to advise the defendant of the nature of the offense charged;
- (7) a statement that the acts of the defendant were against the peace and dignity of the Commonwealth of Pennsylvania or in violation of an ordinance of a political subdivision;
- (8) a notation if criminal laboratory services are requested in the case;
- (9) a notation that the defendant has or has not been fingerprinted;
- (10) a request for the issuance of a warrant of arrest or a summons, unless an arrest has already been effected;
- (11) a verification by the affiant that the facts set forth in the complaint are true and correct to the affiant's personal knowledge, or information and belief, and that any false statements therein are made subject to the penalties of the Crimes Code, 18 Pa.C.S. § 4904, relating to unsworn falsification to authorities;
- (12) a certification that the complaint complies with the provisions of the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania* regarding confidential information and documents; and



## BUCKS COUNTY DEPARTMENT OF CORRECTIONS INCARCERATION DATE

AS OF: 7/29/19 1:02PM

<b>Name:</b>	EDWARDS, GERALD RUSSELL	
<b>Inmate Address</b>	372721 N DARRION Philadelphia, PA 19134	() -
<b>Inmate Address</b>	2076 COUNTY LINE RD. APT 159 HUNTINGDON VALLEY, PA 19006	(267) 226-9709
<b>Inmate Address</b>	1652 PROPECT AVENUE Langhorne, PA 19047	(267) 981-0709
<b>DOB:</b>	11/02/1944	
<b>Sex:</b>	MALE	
<b>BCP#:</b>	109231	
<b>Booking #:</b>	2019001721	
<b>Admit Date:</b>	4/3/19 16:34	
<b>Release Date:</b>	4/8/19 8:34	

## COURT OF COMMON PLEAS OF BUCKS COUNTY

## DOCKET

Docket Number: CP-09-SA-0000318-2019

## SUMMARY APPEAL DOCKET

Non-Traffic



Commonwealth of Pennsylvania

v.

Gerald Edwards

Page 2 of 4

## DISPOSITION SENTENCING/PENALTIES

## Disposition

## Case Event

## Disposition Date

## Final Disposition

## Sequence/Description

## Offense Disposition

## Grade Section

## Sentencing Judge

## Sentence Date

## Credit For Time Served

## Sentence/Diversion Program Type

## Incarceration/Diversionary Period

## Start Date

## Sentence Conditions

## Guilty by Trial (Lower Court)

Defendant Was Present

## Lower Court Disposition

05/01/2019

Not Final

1 / Failure to Maintain Sidewalks/Driveways

Guilty by Trial (Lower Court)

S

LO § 363-101 §§ 302.3

2 / Failure to remove lawn equipment from home property.

Guilty by Trial (Lower Court)

S

LO § 363-101 §§ 324-10

3 / Motor Vehicles

Guilty by Trial (Lower Court)

S

LO § 363-101 §§ 302.8

4 / Weeds - IPMC Section 302.4

Guilty by Trial (Lower Court)

S

LO § 363-101 §§ 302.4

5 / R2 - Use Regulations

Guilty by Trial (Lower Court)

S

LO § 500 §§ 902

6 / Failure to remove lawn equipment from home property.

Guilty by Trial (Lower Court)

S

LO § 363-101 §§ 324-10

## COMMONWEALTH INFORMATION

Name: Mark Landis Freed  
Special Prosecutor

Supreme Court No: 063860

Phone Number(s):  
267-898-0570 (Phone)

Address:  
Curtin & Heefner Llp  
2005 S Easton Rd Ste 100  
Doylestown, PA 18901

## ATTORNEY INFORMATION

Name:

Supreme Court No:

Rep. Status:

Phone Number(s):

## ENTRIES

Sequence Number	CP Filed Date	Document Date	Filed By
Service To	Service By		
Issue Date	Service Type	Status Date	Service Status
1	05/22/2019		Edwards, Gerald
Notice of Summary Appeal Filed			
Edwards, Gerald			
05/22/2019	Hand Delivered		
Bucks County District Attorney's Office			
05/23/2019	E-Mail		
MDJ-07-1-07			
05/23/2019	E-Mail		

**COURT OF COMMON PLEAS OF BUCKS COUNTY****DOCKET**

Docket Number: CP-09-SA-0000318-2019

**SUMMARY APPEAL DOCKET**

Non-Traffic

Commonwealth of Pennsylvania

v.

Gerald Edwards

Page 1 of 4

**CASE INFORMATION**Judge Assigned:Date Filed: 05/22/2019Initiation Date: 05/22/2019OTN:LOTN:Originating Docket No: MJ-07107-NT-0000241-2018Initial Issuing Authority: Daniel BaranoskiFinal Issuing Authority: Daniel BaranoskiArresting Agency: Code Enforcement, MunicipalArresting Officer: Morgan, SandraComplaint/Incident #: R 2249617-6Case Local Number Type(s)Case Local Number(s)**STATUS INFORMATION**Case Status: ActiveStatus DateProcessing StatusComplaint Date: 09/05/2018

05/22/2019

Awaiting Original Papers

05/22/2019

Awaiting Summary Appeal Trial

**CALENDAR EVENTS**Case CalendarScheduleStartRoomJudge NameScheduleEvent TypeStart DateTimeStatus

Summary Appeals

07/19/2019

9:00 am

Room 3404

Scheduled

**DEFENDANT INFORMATION**Date Of Birth:

11/02/1944

City/State/Zip: Langhorne, PA 19047Alias Name

Edwards, Gerald Russell

**CASE PARTICIPANTS**Participant TypeName

Defendant

Edwards, Gerald

**CHARGES**

<u>Seq.</u>	<u>Orig Seq.</u>	<u>Grade</u>	<u>Statute</u>	<u>Statute Description</u>	<u>Offense Dt.</u>	<u>OTN</u>
1	1	S	LO § 363-101 §§302.3	Failure to Maintain Sidewalks/Driveways	09/05/2018	
2	1	S	LO § 363-101 §§324-101	Failure to remove lawn equipment from home property.	09/05/2018	
3	1	S	LO § 363-101 §§302.8	Motor Vehicles	09/05/2018	
4	1	S	LO § 363-101 §§302.4	Weeds - IPMC Section 302.4	09/05/2018	
5	1	S	LO § 500 §§902	R2 - Use Regulations	09/05/2018	
6	1	S	LO § 363-101 §§324-101	Failure to remove lawn equipment from home property.	09/05/2018	

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**COURT OF COMMON PLEAS OF BUCKS COUNTY**

**DOCKET**



Docket Number: CP-09-SA-0000318-2019

**SUMMARY APPEAL DOCKET**

**Non-Traffic**

Commonwealth of Pennsylvania

Page 3 of 4

v.

Gerald Edwards

**ENTRIES**

Sequence Number

CP Filed Date

Document Date

Filed By

1

06/12/2019

Court of Common Pleas - Bucks  
County

Hearing Notice

**COURT OF COMMON PLEAS OF BUCKS COUNTY****DOCKET**

Docket Number: CP-09-SA-0000318-2019

**SUMMARY APPEAL DOCKET**

Non-Traffic

Commonwealth of Pennsylvania

v.

Gerald Edwards

Page 4 of 4

**CASE FINANCIAL INFORMATION**

Last Payment Date: 05/22/2019

Total of Last Payment: -\$64.00

<b>Edwards, Gerald</b> Defendant	<u>Assessment</u>	<u>Payments</u>	<u>Adjustments</u>	<u>Non Monetary</u> <u>Payments</u>	<u>Total</u>
<b>Costs Fees</b>					
Miscellaneous Issuances (Bucks)	\$18.00	\$0.00	\$0.00	\$0.00	\$18.00
Miscellaneous Issuances (Bucks)	\$18.00	\$0.00	\$0.00	\$0.00	\$18.00
Miscellaneous Issuances (Bucks)	\$18.00	\$0.00	\$0.00	\$0.00	\$18.00
Miscellaneous Issuances (Bucks)	\$18.00	\$0.00	\$0.00	\$0.00	\$18.00
Miscellaneous Issuances (Bucks)	\$18.00	\$0.00	\$0.00	\$0.00	\$18.00
Miscellaneous Issuances (Bucks)	\$18.00	\$0.00	\$0.00	\$0.00	\$18.00
Constable Education Training Act	\$5.00	\$0.00	\$0.00	\$0.00	\$5.00
Server Fee - Referred to County	\$67.10	-\$0.97	\$0.00	\$0.00	\$66.13
Server Fee - Referred to County	\$55.50	-\$0.80	\$0.00	\$0.00	\$54.70
Constable Education Training Act	\$5.00	\$0.00	\$0.00	\$0.00	\$5.00
Server Fee - Referred to County	\$27.50	-\$0.40	\$0.00	\$0.00	\$27.10
Server Fee - Referred to County	\$27.50	-\$0.40	\$0.00	\$0.00	\$27.10
Constable Education Training Act	\$5.00	\$0.00	\$0.00	\$0.00	\$5.00
Server Fee - Referred to County	\$27.50	-\$0.40	\$0.00	\$0.00	\$27.10
Server Fee - Referred to County	\$27.50	-\$0.40	\$0.00	\$0.00	\$27.10
Constable Education Training Act	\$5.00	\$0.00	\$0.00	\$0.00	\$5.00
Server Fee - Referred to County	\$27.50	-\$0.40	\$0.00	\$0.00	\$27.10
Server Fee - Referred to County	\$27.50	-\$0.40	\$0.00	\$0.00	\$27.10
Constable Education Training Act	\$5.00	\$0.00	\$0.00	\$0.00	\$5.00
Server Fee - Referred to County	\$27.50	-\$0.40	\$0.00	\$0.00	\$27.10
Server Fee - Referred to County	\$27.50	-\$0.40	\$0.00	\$0.00	\$27.10
Constable Education Training Act	\$5.00	\$0.00	-\$5.00	\$0.00	\$0.00
Summary Appeal Filing Fee (Bucks)	\$59.00	-\$59.00	\$0.00	\$0.00	\$0.00
Automation Fee (Bucks)	\$5.00	-\$0.03	\$0.00	\$0.00	\$4.97
Costs/Fees Totals:	\$544.60	-\$64.00	-\$5.00	\$0.00	\$475.60
Grand Totals:	\$544.60	-\$64.00	-\$5.00	\$0.00	\$475.60

\*\* - Indicates assessment is subrogated

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## DOCKET



Docket Number: CP-09-SA-0000401-2019

## SUMMARY APPEAL DOCKET

Non-Traffic

Commonwealth of Pennsylvania

v.

Gerald Edwards

Page 1 of 1

## CASE INFORMATION

Cross Court Docket Nos: 2301 EDA 2019

Judge Assigned:

Date Filed: 06/24/2019

Initiation Date: 06/24/2019

OTN:

LOTN:

Originating Docket No: MJ-07107-NT-0000077-2019

Initial Issuing Authority: Daniel Baranoski

Final Issuing Authority: Daniel Baranoski

Arresting Agency: Code Enforcement, Municipal

Arresting Officer: Morgan, Sandra

Complaint/Incident #: R 2249661-1

Case Local Number/Type(s)

Case Local Number(s)

## STATUS INFORMATION

<u>Case Status:</u>	Closed	<u>Status Date</u>	<u>Processing Status</u>	<u>Complaint Date:</u>	04/11/2019
		08/09/2019	Sentenced/Penalty imposed		
		08/09/2019	Awaiting Sentencing		
		08/09/2019	Awaiting Appellate Court Decision		
		06/24/2019	Awaiting Original Papers		
		06/24/2019	Awaiting Summary Appeal Trial		

## CALENDAR EVENTS

<u>Case Calendar</u>	<u>Schedule</u>	<u>Start</u>	<u>Room</u>	<u>Judge Name</u>	<u>Schedule</u>
<u>Event Type</u>	<u>Start Date</u>	<u>Time</u>			<u>Status</u>
Summary Appeals	08/09/2019	9:00 am	Room 3404		Scheduled

## DEFENDANT INFORMATION

Date Of Birth: 11/02/1944 City/State/Zip: Langhorne, PA 19047

Alias Name

Edwards, Gerald Russell

## CASE PARTICIPANTS

<u>Participant Type</u>	<u>Name</u>
Defendant	Edwards, Gerald

## CHARGES

<u>Seq.</u>	<u>Orig Seq.</u>	<u>Grade</u>	<u>Statute</u>	<u>Statute Description</u>	<u>Offense Dt.</u>	<u>OTN</u>
1	1	S	LO § 500-2305 §§ B1	Failure to Apply for Permits for Fences	04/11/2019	

## DISPOSITION SENTENCING/PENALTIES

<u>Disposition</u>	<u>Disposition Date</u>	<u>Final Disposition</u>
<u>Case Event</u>	<u>Offense Disposition</u>	<u>Grade</u> <u>Section</u>
<u>Sequence/Description</u>	<u>Sentence Date</u>	<u>Credit For Time Served</u>
<u>Sentencing Judge</u>	<u>Incarceration/Diversory Period</u>	<u>Start Date</u>
<u>Sentence Diversion Program Type</u>		
<u>Sentence Conditions</u>		

CP0904192

Printed: 08/11/2019

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**COURT OF COMMON PLEAS OF BUCKS COUNTY****DOCKET**

Docket Number: CP-09-SA-0000401-2019

**SUMMARY APPEAL DOCKET**

Non-Traffic



Commonwealth of Pennsylvania

v.

Gerald Edwards

Page 2 of 4

**DISPOSITION SENTENCING/PENALTIES**DispositionCase EventSequence/DescriptionSentencing JudgeSentence/Diversion Program TypeSentence ConditionsDisposition DateOffense DispositionSentence DateIncarceration/Diversionary PeriodFinal DispositionGrade SectionCredit For Time ServedStart Date**Guilty by Trial (Lower Court)**

Defendant Was Not Present

Lower Court Disposition

05/29/2019

Not Final

1 / Failure to Apply for Permits for Fences

Guilty by Trial (Lower Court)

S

LO § 500-2305 §§ B1

**Guilty**Summary Appeals

08/09/2019

Final Disposition

1 / Failure to Apply for Permits for Fences

Guilty

S

LO § 500-2305 §§ B1

Waite, Clyde W.

08/09/2019

The following Judge Ordered Conditions are imposed:

Condition

Pay Costs &amp; fines

**COMMONWEALTH INFORMATION**Name:Supreme Court No:**ATTORNEY INFORMATION**Name:Supreme Court No:Rep. Status:Phone Number(s):**ENTRIES**Sequence NumberCP Filed DateDocument DateFiled ByService ToService ByIssue DateService TypeStatus DateService Status

1 06/24/2019 Edwards, Gerald

Notice of Summary Appeal Filed

Bucks County District Attorney's Office

06/24/2019 E-Mail

Edwards, Gerald

06/24/2019 Hand Delivered

MDJ-07-1-07

06/24/2019 E-Mail

1 07/03/2019

Court of Common Pleas - Bucks  
County

Hearing Notice

CPCMS 9082

Printed: 08/16/2019

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**COURT OF COMMON PLEAS OF BUCKS COUNTY****DOCKET**

Docket Number: CP-09-SA-0000401-2019

**SUMMARY APPEAL DOCKET**

Non-Traffic

Commonwealth of Pennsylvania

v.

Gerald Edwards

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**ENTRIES**

<u>Sequence Number</u>	<u>CP Filed Date</u>	<u>Document Date</u>	<u>Filed By</u>
1	08/09/2019		Edwards, Gerald
Notice of Appeal to the Superior Court From the order 8/9/19			
2	08/09/2019		Edwards, Gerald
Motion for Finding and Facts and Conclusion in Law fwd Returned to file			
3	08/09/2019		Bucks County District Attorney's Office
Exhibits Filed			
4	08/09/2019		Waite, Clyde W.
Disposition Filed			
5	08/09/2019		Waite, Clyde W.
Guilty			
6	08/09/2019		Waite, Clyde W.
Order - Sentence/Penalty Imposed			
1	08/13/2019		Court of Common Pleas - Bucks County
Penalty Assessed			

**PAYMENT PLAN SUMMARY**

<u>Payment Plan No</u>	<u>Payment Plan Freq.</u>	<u>Next Due Date</u>	<u>Active</u>	<u>Overdue Amt</u>
<u>Responsible Participant</u>			<u>Suspended</u>	<u>Next Due Amt</u>
09-2019-P000004415	Monthly	08/10/2020	Yes	\$0.00
Edwards, Gerald			No	\$100.00

Payment Plan History:	<u>Receipt Date</u>		<u>Payor Name</u>	<u>Participant Role</u>	<u>Amount</u>
	04/20/2018	Payment	Edwards, Gerald	Defendant	\$5.00
	05/21/2018	Payment	Edwards, Gerald	Defendant	\$47.00
	05/22/2019	Payment	Edwards, Gerald	Defendant	\$5.00
	05/31/2019	Payment	Edwards, Gerald	Defendant	\$40.25
	05/31/2019	Payment	Edwards, Gerald	Defendant	\$40.25
	05/31/2019	Payment	Edwards, Gerald	Defendant	\$19.50
	06/24/2019	Payment	Edwards, Gerald	Defendant	\$5.00

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**COURT OF COMMON PLEAS OF BUCKS COUNTY****DOCKET**

Docket Number: CP-09-SA-0000401-2019

**SUMMARY APPEAL DOCKET**

Non-Traffic



Commonwealth of Pennsylvania

v.

Gerald Edwards

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**CASE FINANCIAL INFORMATION**

Last Payment Date: 08/09/2019

Total of Last Payment: -\$59.00

<b>Edwards, Gerald</b>	<u>Assessment</u>	<u>Payments</u>	<u>Adjustments</u>	<u>Non Monetary</u>	<u>Total</u>
Defendant				<u>Payments</u>	
<b>Costs/Fees</b>					
Summary Appeal Filing Fee (Bucks)	\$59.00	(\$59.00)	\$0.00	\$0.00	\$0.00
Automation Fee (Bucks)	\$5.00	(\$5.00)	\$0.00	\$0.00	\$0.00
Superior Court Appeal (Bucks)	\$59.00	(\$59.00)	\$0.00	\$0.00	\$0.00
ATJ	\$6.00	\$0.00	\$0.00	\$0.00	\$6.00
CJES	\$2.50	\$0.00	\$0.00	\$0.00	\$2.50
Commonwealth Cost - HB627 (Act 167 of 1992)	\$9.00	\$0.00	\$0.00	\$0.00	\$9.00
County Court Cost (Act 204 of 1976)	\$33.00	\$0.00	\$0.00	\$0.00	\$33.00
JCPS	\$21.25	\$0.00	\$0.00	\$0.00	\$21.25
Judicial Computer Project	\$8.00	\$0.00	\$0.00	\$0.00	\$8.00
OAG - JCP	\$2.50	\$0.00	\$0.00	\$0.00	\$2.50
Sheriff Fee (Bucks)	\$5.00	\$0.00	\$0.00	\$0.00	\$5.00
State Court Costs (Act 204 of 1976)	\$9.00	\$0.00	\$0.00	\$0.00	\$9.00
Postage (Bucks)	\$2.00	\$0.00	\$0.00	\$0.00	\$2.00
Summary Matters Charge (Bucks)	\$32.00	\$0.00	\$0.00	\$0.00	\$32.00
Admin Fee (Bucks)	\$20.00	\$0.00	\$0.00	\$0.00	\$20.00
Information Service Fee (Bucks)	\$10.00	\$0.00	\$0.00	\$0.00	\$10.00
Costs/Fees Totals:	\$283.25	(\$123.00)	\$0.00	\$0.00	\$160.25
<b>Fines</b>					
Local Ordinance	\$1,000.00	\$0.00	\$0.00	\$0.00	\$1,000.00
Fines Totals:	\$1,000.00	\$0.00	\$0.00	\$0.00	\$1,000.00
Grand Totals:	\$1,283.25	(\$123.00)	\$0.00	\$0.00	\$1,160.25

\*\* - Indicates assessment is subrogated

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Name: Edwards, Gerald  
Age: 74Y DOB: Nov 02, 1944  
Gender: M Wt: 114.60 kg Ht: 182.88 cm  
MedRec: 3774732  
AcctNum: LP0335707857  
Attending: PJT  
Primary RN: NJM3  
Bed: ED 2V 10

## ST MARY MEDICAL CENTER PROCEDURES AND TESTS

---

You were seen in the Emergency Department on: Thu Apr 11, 2019

### PROCEDURES PERFORMED

No Information Available

### TESTS PERFORMED

CARDIAC TROPONIN I

CBC with DIFF

Chest – 1 View

COMPREHENSIVE METABOLIC PANEL

Electrocardiogram

MAGNESIUM

Social Service Consult

Vital Signs – Orthostatic



Name: Edwards, Gerald  
Age: 74Y DOB: Nov 02, 1944  
Gender: M Wt: 114.60 kg Ht: 182.88 cm  
MedRec: 3774732  
AcctNum: LP0335707857  
Attending: PJT  
Primary RN: NJM3  
Bed: ED 2V 10

## ST MARY MEDICAL CENTER DISCHARGE INSTRUCTIONS

---

The tooth pain may be made worse by drinking hot or cold fluids. It may spread from the tooth to the ear or jaw on the same side.

### HOME CARE:

Avoid hot and cold foods, and liquids since your tooth may be sensitive to temperature changes.

If your tooth is chipped or cracked, or if there is a large open cavity, apply OIL OF CLOVES (available over-the-counter in drug stores) directly to the tooth to reduce pain. Some pharmacies carry an over-the-counter "toothache kit." This contains oil of cloves and a paste, which can be applied over the exposed tooth to decrease sensitivity.

An ice pack on your jaw over the sore area may help to reduce pain.

You may use acetaminophen (Tylenol) or ibuprofen (Motrin, Advil) to control pain, unless another pain medicine was prescribed. [ NOTE: If you have liver disease or ever had a stomach ulcer, talk with your doctor before using these medicines.]

If you have signs of an infection, an antibiotic will be given. Take it as directed.

FOLLOW-UP with your dentist as directed. Although your pain may go away with the treatment given, only a dentist can fully evaluate and treat this problem to prevent further tooth damage.

GET PROMPT MEDICAL ATTENTION if any of the following occur:

Redness or swelling of the face

Pain worsens or spreads to the neck

Fever over 100.5 °F (38°C)

Unusual drowsiness; headache or stiff neck; weakness or fainting

Pus drains from the tooth or gum

Difficulty swallowing or breathing

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### DIZZINESS, UNK CAUSE

DIZZINESS [Uncertain cause]

Dizziness is a common symptom sometimes described as "lightheadedness" or feeling like you are going to faint. If it lasts for only a few seconds and is related to changes in position (such as getting up after lying or sitting for a long time), it is usually not a sign of anything serious. Dizziness that lasts for minutes to hours, or comes on for no apparent reason, may be a sign of a more serious problem (such as dehydration, a medicine reaction, disease of the heart or brain).

Today's exam did not show an exact cause for your dizzy spell . Sometimes additional tests are required before a cause can be found. Therefore, it is important to follow



Name: Edwards, Gerald  
Age: 74Y DOB: Nov 02, 1944  
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MedRec: 3774732  
AcctNum: LP0335707857  
Attending: PJT  
Primary RN: NJM3  
Bed: ED 2V 10

## ST MARY MEDICAL CENTER DISCHARGE INSTRUCTIONS

---

up with your doctor if your symptoms continue.

### HOME CARE:

- 1) If a dizzy spell occurs and lasts more than a few seconds, lie down until it passes. If you are lying down, then you cannot hurt yourself by falling if you do faint.
- 2) Do not drive or operate dangerous equipment until the dizzy spells have stopped for at least 48 hours.
- 3) If dizzy spells occur with sudden standing, this may be a sign of mild dehydration. Drink extra fluids over the next few days.
- 4) If you recently started a new medicine or if you had the dose of a current medicine increased (especially blood pressure medicine), talk with the prescribing doctor about your symptoms. Dose adjustments may be needed.

FOLLOW UP with your doctor for further evaluation within the next seven days, if your symptoms continue.

GET PROMPT MEDICAL ATTENTION if any of the following occur:

- Worsening of your symptoms
- Fainting, headache or seizure
- Repeated vomiting
- Feeling like you or the room is spinning
- Chest, arm, neck, back or jaw pain
- Palpitations (the sense that your heart is fluttering or beating fast or hard)
- Shortness of breath
- Blood in vomit or stool (black or red color)
- Weakness of an arm or leg or one side of the face
- Difficulty with speech or vision



**Name: Edwards, Gerald**  
Age: 74Y DOB: Nov 02, 1944  
Gender: M Wt: 114.60 kg Ht: 182.88 cm  
MedRec: 3774732  
AcctNum: LP0335707857  
Attending: PJT  
Primary RN: NJM3  
Bed: ED 2V 10

## ST MARY MEDICAL CENTER DISCHARGE INSTRUCTIONS

---

care. Always follow your healthcare professional's instructions.

### PRESCRIPTIONS (1)

Printed (1)

Augmentin : tablet : 875 mg-125 mg : ORAL  
Quantity: 1, Unit: tab(s), Route: ORAL, Schedule: 2 times a day, Dispense: 20  
Unit: tab(s)



**Name: Edwards, Gerald**  
Age: 74Y DOB: Nov 02, 1944  
Gender: M Wt: 114.60 kg Ht: 182.88 cm  
MedRec: 3774732  
AcctNum: LP0335707857  
Attending: PJT  
Primary RN: NJM3  
Bed: ED 2V 10

## **ST MARY MEDICAL CENTER PROCEDURES AND TESTS**

---

You were seen in the Emergency Department on: Thu Apr 11, 2019

### **PROCEDURES PERFORMED**

No Information Available

### **TESTS PERFORMED**

CARDIAC TROPONIN I

CBC with DIFF

Chest – 1 View

COMPREHENSIVE METABOLIC PANEL

Electrocardiogram

MAGNESIUM

Social Service Consult

Vital Signs – Orthostatic



**Name: Edwards, Gerald**  
Age: 74Y DOB: Nov 02, 1944  
Gender: M Wt: 114.60 kg Ht: 182.88 cm  
MedRec: 3774732  
AcctNum: LP0335707857  
Attending: PJT  
Primary RN: NJM3  
Bed: ED 2V 10

## ST MARY MEDICAL CENTER DISCHARGE INSTRUCTIONS

---

in Bucks County.

### FINAL DIAGNOSIS

decayed tooth

### ADDITIONAL DIAGNOSIS

Dental infection  
Dizziness

### TREATED BY:

Attending Physician - Torradas Md, Jose  
Primary Nurse(s) - Maurstad, Julie; Burandt, Melissa

### FOLLOWUP CONTACTS

NONE, DOCTOR M, Medicine Family Practice  
1205 LANGHORNE-NEWTOWN ROAD  
LANGHORNE  
LANGHORNE PA

TORRADAS, JOSE R, Medicine Emergency  
1201 LANGHORNE-NEWTOWN ROAD  
LANGHORNE  
LANGHORNE PA  
Phone: (215)710-2100

### SPECIAL INSTRUCTIONS

Please follow up with outpatient physician this week for outpatient evaluation and long term care. We recommend follow up with local dentist for likely extraction of your tooth and continued care. Augmentin twice a day has been prescribed for tooth infection. Important to stay well hydrated and eat regular meals. Return to the ER for any acute or worsening symptoms for which you feel you need to be evaluated emergently.

### MEDICAL INSTRUCTIONS

#### CAVITY DENTAL

##### DENTAL CAVITY

A dental cavity is a pit or crater in the enamel surface of the tooth. This exposes the sensitive inner layer of the tooth and causes pain. If untreated, the cavity will get bigger and may cause an infection or abscess in the root of the tooth. An infection in the tooth is a much more serious problem and may require a root canal or removal of the entire tooth.



## ST MARY MEDICAL CENTER PRIMARY

Edwards, Gerald  
DOB: 11/2/1944 M74  
Wt/Ht: 114.60 Kg 182.88 cm.  
MedRec: 3774732  
AcctNum: LP0335707857

**PREVIOUS VISIT ALLERGIES:** No Known Allergies. (The Apr 11, 2019 10:55 NLQG  
No Known Allergies. (11/24 NIM3)

### PAST MEDICAL HISTORY

**PROVIDER ALERT:** Nursing history reviewed and agreed up to this time in documentation,  
except were noted. (11/37 SCRF)

**MEDICAL HISTORY:** Past medical history includes skin history, eczema, Flu vaccine not  
up to date, Tetanus not up to date, Past medical history includes pulmonary disease, emphysema.  
hard of hearing. (11/24 NIM3)

**SURGICAL HISTORY:** Patient has no surgical history. (11/24 NIM3)

**PSYCHIATRIC HISTORY:** No previous psychiatric history. (11/24 NIM3)

**SOCIAL HISTORY:** Patient is a former tobacco user, smoked cigarettes. Patient  
quit smoking more than 10 years ago. Patient denies alcohol use, Patient denies drug use, Lives  
at home, alone. (11/24 NIM3)

**FAMILY HISTORY:** Family history reviewed and not relevant. FHx reviewed, Family history  
reviewed and not relevant. Family history reviewed. (11/24 NIM3)  
Family Hx reviewed. (11/37 SCRF)

**NOTES:** Nursing history reviewed and agreed up to this time in documentation, except were  
noted. (11/37 SCRF)

### CURRENT MEDICATIONS (11/24 NIM3)

Med History Denied

Med and Allergy History from Patient

### NURSING ASSESSMENT: DENTAL (11/20 NIM3)

**CONSTITUTIONAL:** Patient cooperative, Patient alert. Oriented to person, place and time,  
Skin warm, Skin dry. Skin normal in color, Mucous membranes pink, Mucous membranes moist, Gait  
steady, History obtained from patient, Patient appears comfortable.

**PAIN:** Patient rates pain as 0 out of 10.

**DENTAL:** Teeth abnormal: gums tender, right lower. Notes: Pt missing most  
teeth, swelling and redness just posterior to right lower tooth. Pt reports discomfort began about a  
month ago.

**SAFETY:** Side rails up, Cart/Stretcher in lowest position. Call light within reach, Hospital ID  
band on.

### NURSING ASSESSMENT: NEURO

**NEURO:** Pupils equally round and reactive to light, Able to close eyes, Face symmetrical,  
Speech normal, GCS: Eye opening: (4) – Spontaneous, Verbal: (5) – Oriented/conversive,  
Motor: (6) – Obeys commands/Spontaneous, GCS Total: 15, Hand grasps equal, Upper  
extremity strength strong, Foot press equal, Lower extremity strength strong, Associated with  
dizziness described as: feeling unsteady. Notes: PT complains to MD feeling  
intermittently dizzy. (11/35 NIM3)

Pupils equally round and reactive to light, Able to close eyes, Face symmetrical, Speech normal,  
GCS: Eye opening: (4) – Spontaneous, Verbal: (5) – Oriented/conversive, Motor: (6) – Obeys  
commands/Spontaneous, GCS Total: 15, Hand grasps equal, Upper extremity strength strong,  
Foot press equal, Lower extremity strength strong, Associated with dizziness described as:  
feeling unsteady, Notes: Pt watching TV, no distress noted. (12/35 NIM3)

Pupils equally round and reactive to light, Able to close eyes, Face symmetrical, Speech normal,  
GCS: Eye opening: (4) – Spontaneous, Verbal: (5) – Oriented/conversive, Motor: (6) – Obeys  
commands/Spontaneous, GCS Total: 15, Hand grasps equal, Upper extremity strength strong,  
Foot press equal, Lower extremity strength strong, Notes: Pt awaits social work, no complaints  
offered. (11/35 NIM3)

**ENT:** Nasal assessment findings include nose normal to inspection, Sinuses normal, Nasal  
mucosa normal, Mouth and throat assessment findings include mouth inspection normal, Mucous



Name: Edwards, Gerald  
Age: 74Y DOB: Nov 02, 1944  
Gender: M Wt: 114.60 kg Ht: 182.88 cm  
MedRec: 3774732  
AcctNum: LP0335707857  
Attending: PJT  
Primary RN: NJM3  
Bed: ED 2V 10

## ST MARY MEDICAL CENTER DISCHARGE INSTRUCTIONS

---

in Bucks County.

### FINAL DIAGNOSIS

decayed tooth

### ADDITIONAL DIAGNOSIS

Dental infection  
Dizziness

### TREATED BY:

Attending Physician - Torradas Md, Jose  
Primary Nurse(s) - Maurstad, Julie; Burandt, Melissa

### FOLLOWUP CONTACTS

NONE, DOCTOR M, Medicine Family Practice  
1205 LANGHORNE-NEWTOWN ROAD  
LANGHORNE  
LANGHORNE PA

TORRADAS, JOSE R, Medicine Emergency  
1201 LANGHORNE-NEWTOWN ROAD  
LANGHORNE  
LANGHORNE PA  
Phone: (215)710-2100

### SPECIAL INSTRUCTIONS

Please follow up with outpatient physician this week for outpatient evaluation and long term care. We recommend follow up with local dentist for likely extraction of your tooth and continued care. Augmentin twice a day has been prescribed for tooth infection. Important to stay well hydrated and eat regular meals. Return to the ER for any acute or worsening symptoms for which you feel you need to be evaluated emergently.

### MEDICAL INSTRUCTIONS

#### CAVITY DENTAL

#### DENTAL CAVITY

A dental cavity is a pit or crater in the enamel surface of the tooth. This exposes the sensitive inner layer of the tooth and causes pain. If untreated, the cavity will get bigger and may cause an infection or abscess in the root of the tooth. An infection in the tooth is a much more serious problem and may require a root canal or removal of the entire tooth.

**GERALD EDWARDS**

2721 N DARIEN ST (215) 981-0709 Refills Left: 0  
 PHILADELPHIA, PA 19133 DOB: 11-02-44  
 VENTOLIN HFA INHALER EXP: 8/22/20 #200 DAW: 0  
 00173-0682-20 GLAXO SMITHKLINE  
 Price: \$59.96 Copay: \$8.50 Bill: ARP  
 ALLEN, ALLISON DEA: MA5022695  
 Phone: (215) 710-2633 State License: B  
 1205 LANGHORNE NEWTO RPh: AB  
 LANGHORNE PA 19047 Rx# **514557**

**GERALD EDWARDS**Rx: **514557**

8-23-19

ALLEN, ALLISON  
 RPh: AB  
 Copay: \$8.50

Bill: ARP

Received by: \_\_\_\_\_

PATIENT: ( )Counseled ( )Refused Counseling ( )Other

Rx: **514557****GERALD EDWARDS**

8-23-19 RPh: AB

2721 N DARIEN ST  
 PHILADELPHIA, PA 19133  
 VENTOLIN HFA INHALER  
 #200

COPAY: \$8.50

(215) 981-0709

BILL: ARP

**NO REFILLS****ST. CLARE PHARMACY**1203 LANGHORNE NEWTOWN RD  
LANGHORNE, PA 19047**GERALD EDWARDS**2721 N DARIEN ST (215) 981-0709  
PHILADELPHIA, PA 19133**VENTOLIN HFA INHALER**

NDC: 00173-0682-20 GLAXO SMITHKLINE

Price: \$59.96

Copay: \$8.50

Bill: ARP

ALLEN, ALLISON

DEA: MA5022695

Phone: (215) 710-2633

State License: B

1205 LANGHORNE NEWTO

LANGHORNE PA 19047

**USE (2) SPRAYS BY MOUTH EVERY 4-6****HOURS AS NEEDED****TELEPHONE Rx**  
**8-23-19**Rx: **514557**

Refills Left: 0

DOB: 11-02-44

QTY: #200

**\*ORIGINAL\***

RPh: AB

TIME: \_\_\_\_\_

DATE: \_\_\_\_\_

DAW: 0

**ST. CLARE PHARMACY**1203 LANGHORNE NEWTOWN RD  
LANGHORNE, PA 19047 (215) 710-7427Rx# **514557**

Refills Left: 0

Until: 08-22-20 8-23-19

For: **GERALD EDWARDS**

2721 N DARIEN ST PHILADELPHIA, PA 19133

**USE (2) SPRAYS BY MOUTH EVERY 4-6**  
**HOURS AS NEEDED****VENTOLIN HFA INHALER**  
**#200**

ALLEN, ALLISON

GLAXO SMITHKLINE

RPh: AB

# Referral Order

1:45 9 July

06/04/2019

To Provider	From Provider
<b>JEAN MURPHY</b>  333 N OXFORD VALLEY RD STE 106 FAIRLESS HILLS, PA 19030 Phone: Phone: (215) 945-8222 Fax: Fax: (215) 945-8224	<b>ALLISON ALLEN, CRNP</b> SMPG St Mary Health Main Campus 1205 Langhorne-Newtown Rd Suite 102 LANGHORNE, PA 19047-1219 Phone: (215) 710-2633 Fax: (215) 710-2638

269 1430  
994 4771

## Referral Order Information

215 504 0600

<b>Diagnosis</b>	<ul style="list-style-type: none"> <li>Dental caries</li> <li>ICD-10: K02.9: Dental caries, unspecified</li> </ul>
<b>Order Name</b>	Orders included: 1  Dental caries ICD-10: K02.9: Dental caries, unspecified <ul style="list-style-type: none"> <li>DENTAL REFERRAL</li> </ul> Schedule Within: provider's discretion
<b>Notes</b>	

## Patient Information

<b>Patient Name</b>	EDWARDS, GERALD
<b>Sex - DOB - Age</b>	M 11/02/1944 74yo
<b>Address</b>	2721 N DARIEN ST PHILADELPHIA, PA 19133-2011
<b>Phone</b>	H: (267)226-9709
<b>Primary Insurance</b>	MEDICARE-PA (MEDICARE)
<b>Secondary Insurance</b>	

Electronically Signed by: ALLISON ALLEN, CRNP

Allison Allen, CRNP

7L00AL

06/04/2019 2:47pm  
ALLISON ALLEN, CRNP

Ld  
700AL

Lui

606 500RAH BALE BLV

Yordly

337  
oxford valley

**EDWARDS, GERALD (id #387563, dob: 11/02/1944)**

**Patient**

**Name** EDWARDS, GERALD (74yo, M) ID# 387563 **Appt. Date/Time** 06/04/2019 01:45PM  
**DOB** 11/02/1944 **Service Dept.** SMPG\_St Mary Health Main Campus  
**Provider** ALLISON ALLEN, CRNP  
**Insurance** Med Primary: MEDICARE-PA (MEDICARE)  
Insurance # : 196345404A  
Prescription: OPTUMRX - Member is eligible.

**Chief Complaint**

new patient

Patient is here today to get established. He was in the ER on April 11th, 2019. He was never admitted. He was there for dizziness.

**Patient's Pharmacies**

**ST. CLARE PHARMACY (ERX): 1203 LANGHORNE NEWTOWN RD, LANGHORNE PA 19047, Ph (215) 710-7427, Fax (215) 710-7434**

**Vitals**

**Ht:** 6 ft Standing  
**Wt:** 250 lbs 8 oz With clothes  
**BMI:** 34  
**BP:** 118/72 sitting R arm  
**Pulse:** 66 bpm regular  
**T:** 97.7 F° ear  
**O2Sat:** 98% Room Air at Rest

**Measurements**

None recorded.

**Allergies**

**Reviewed Allergies**

NKDA

**Medications**

No medications reported

**Problems**

**Reviewed Problems**

**Family History**

**Reviewed Family History**

**Social History**

**Reviewed Social History**

**Adult General**

\*\*\*ABUSE\*\*\* last updated: 06/04/2019

Date Previous Abuse Screening Performed:: 06/04/2019

Have you ever been emotionally or physically abused by your partner, caregiver or someone important to you?: No

Within the past year, have you been hit, kicked or otherwise physically hurt by someone?: No

Within the last year, has anyone forced you to have sexual activity?: No

Are you afraid of your partner, caregiver or anyone else?: No

Clinician/Family believes neglect, abuse, or exploitation may exist:: N

\*\*\*AMBULATORY\*\*\* last updated: 06/04/2019

Is the patient ambulatory?: Yes: walks without restrictions

\*\*\*TOBACCO (Smoking/Smokeless)\*\*\* last updated: 06/04/2019

Smoking Status: Former smoker

What type of smoking product used?: Cigarette

Smoker (1/2 PPD)

Has smoked since age: 18

Smokeless tobacco status?: Never user

St. Mary's Hospital Group • 1705 Lombard St., New York, NY 10012-1219

**EDWARDS, GERALD (id #387563, dob: 11/02/1944)**

- DIZZINESS: CARE INSTRUCTIONS
- 5. **Retention of urine** - History of urinary retention s/p catheterization and flomax. Pt no longer taking flomax and denies any symptoms.  
R33.9: Retention of urine, unspecified
  - URINARY RETENTION: CARE INSTRUCTIONS
- 6. **Reduced visual acuity** - referral provided.  
H54.7: Unspecified visual loss
  - OPHTHALMOLOGY REFERRAL - Schedule Within: provider's discretion
- 7. **Nocturia** - Check PSA.  
R35.1: Nocturia
  - PSA, SERUM OR PLASMA
- 8. **History of emphysema** - Stable. Has never followed with specialist. Reports use of an inhaler at some time, but no longer requiring. Will continue to monitor.  
Z87.09: Personal history of other diseases of the respiratory system
- 9. **At risk for falls** - STEADI 6/14: Pt not currently taking any medications. Will continue to monitor symptoms.  
Z91.81: History of falling
- 10. **Screening for malignant neoplasm of colon** - recommended screening - give colonoscopy referral.  
Z12.11: Encounter for screening for malignant neoplasm of colon
  - COLONOSCOPY REFERRAL - Schedule Within: provider's discretion
- 11. **Body mass index 30+ - obesity** - Encouraged healthy diet and exercise habits.  
Z68.34: Body mass index (BMI) 34.0-34.9, adult
  - A HEALTHY LIFESTYLE: CARE INSTRUCTIONS
  - BODY MASS INDEX: CARE INSTRUCTIONS
  - LEARNING ABOUT HEALTHY WEIGHT
  - LIPID PANELFasting: Y

#### Goals

Return to Office

- Allison Allen, CRNP for Established Patient 45 at SMPG\_St Mary Health Main Campus on 09/04/2019 at 09:30 AM

Encounter Sign-Off

Encounter signed-off by Allison Allen, CRNP, 06/04/2019.

Encounter performed and documented by Allison Allen, CRNP

Encounter reviewed & signed by Allison Allen, CRNP on 06/04/2019 at 6:53pm

Screening: PHQ-2/PHQ-9 GAD-7 STEADI Fall Risk

IN THE COMMONWEALTH COURT OF PENNSYLVANIA

COMMONWEALTH OF  
PENNSYLVANIA

NO. [REDACTED]

v.

GERALD EDWARDS

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by

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**ENTRY OF APPEARANCE**

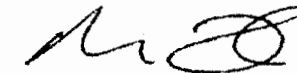
TO THE PROTHONOTARY:

Kindly enter our appearance as Solicitor for Middletown Township, Bucks County on behalf of the Commonwealth of Pennsylvania in the above-captioned action.

CURTIN & HEEFNER LLP

Date: [REDACTED] 2019

By:



Mark L. Freed, Esq.  
PA ID No. 63860  
James J. Esposito  
PA ID 93183  
Doylestown Commerce Center  
2005 S. Easton Road, Suite 100  
Doylestown, PA 18901  
Tel.: 267-898-0570  
mlf@curtinheefner.com  
jje@curtinheefner.com







1 two summary appeals that are here for  
2 determination today, that is 318 of  
3 2019, and 401 of 2019.

4 Are you saying that there are  
5 motions that you're filing with respect  
6 to those two summary appeals?

7 MR. EDWARDS: Yes. And complaints  
8 too.

9 THE COURT: What do you mean  
10 "complaints"?

11 MR. EDWARDS: A criminal complaint.

12 THE COURT: You're filing a criminal  
13 complaint?

14 MR. EDWARDS: (Nods.)

15 THE COURT: Against the township?

16 MR. EDWARDS: Yes.

17 THE COURT: Well, now, I don't know  
18 if this is going to be some kind of  
19 circus, but -- and you're here without  
20 counsel. But I suspect, based on what  
21 I've heard so far, that there have been  
22 some extensive interactions between you  
23 and Middletown Township about this  
24 property.

25 And I would suspect that you have

1 some knowledge, maybe it's basic, but I  
2 suspect you have some knowledge of the  
3 process and procedures that we follow  
4 here.

5 So if there is some kind of a motion  
6 that you are filing with respect to the  
7 citations that have been filed against  
8 you, you said that you served them on  
9 Mr. Freed who said that he has not  
10 received any motions from you.

11 Now, are these motions something  
12 that you filed with respect to those  
13 prior citations or do they relate to  
14 these current citations?

15 MR. EDWARDS: Well, can I file these  
16 today?

17 THE COURT: I don't know what  
18 "these" are. You would file -- if you  
19 were filing motions, you would generally  
20 file the motions with the, I guess it  
21 would be the Clerk of Courts, these  
22 being quasi-criminal.

23 MR. EDWARDS: I did file a few  
24 things with the Clerk of Courts, but I  
25 didn't get no response.

1 MR. EDWARDS: Right.

2 THE COURT: That's up to you to  
3 determine what you should do. And as I  
4 said, I presume that you have some basic  
5 knowledge of what takes place here.

6 What are these motions that you have  
7 right now? What do they deal with?

8 MR. EDWARDS: Well, I did file one.  
9 I sent one --

10 THE COURT: Would you repeat --  
11 would you repeat the question I just  
12 asked you.

13 MR. EDWARDS: Yes. Subject matter  
14 jurisdiction.

15 THE COURT: Subject matter  
16 jurisdiction? And what about that?

17 MR. EDWARDS: Once subject matter  
18 jurisdiction has arrived, the Court --  
19 or the plaintiff has to prove subject  
20 matter jurisdiction so that they have  
21 jurisdiction over the matter.

22 THE COURT: And?

23 MR. EDWARDS: Okay. The next one  
24 would be --

25 THE COURT: Well, what is it -- so

1           you're saying that this proceeding can't  
2           go forward because the Court does not  
3           have subject matter jurisdiction? Is  
4           that what you're saying?

5           MR. EDWARDS: Right.

6           THE COURT: And what is your reason  
7           for saying that there is no jurisdiction  
8           here?

9           MR. EDWARDS: The Pennsylvania  
10          Constitution stipulates how the laws are  
11          passed. Article 3 -- Article 3 all the  
12          way through to 10, stipulates how the  
13          law is passed.

14          Criminal procedure is another one  
15          that was not followed for -- to get the  
16          matter to this Court.

17          THE COURT: Well --

18          MR. EDWARDS: Okay.

19          THE COURT: These motions have not  
20          been filed and, therefore --

21          MR. EDWARDS: Nature and cause.

22          THE COURT: They have not been  
23          filed; therefore, they are not before  
24          this Court, so...

25          All right. Mr. Freed, you can start

1 Basis for the objection?

2 MR. EDWARDS: Yes. The things --  
3 the matter that I raised was that the  
4 township ordinances are not laws  
5 according to the Pennsylvania  
6 Constitution, Article 3, going through,  
7 I believe, 10.

8 THE COURT: All right. The  
9 objection is overruled.

10 Go ahead.

11 BY MR. FREED:

12 Q. So what do your duties entail as a code  
13 enforcement officer?

14 A. When we receive concerns or complaints from  
15 residents, even sometimes non-residents that come into  
16 the township, regarding property maintenance, it could be  
17 under zoning ordinances, I am required to go out and look  
18 at the property and make a determination if, one, A) the  
19 property is in violation under our township ordinances,  
20 and of course I have to apply the violation to the exact  
21 written ordinance.

22 I send a letter of violation if the property is in  
23 violation for the specific issue.

24 Q. And then what happens after a notice of violation?

25 A. I state in the letter they have 30 days to comply

16 C-5.

17 MR. FREED: Your Honor, I premarked  
18 these just to keep things moving, so  
19 they may be out of order a little bit.  
20 I apologize.

21 THE COURT: Go ahead.

22 MR. FREED: May I approach, Your  
23 Honor?

24 THE COURT: Yes.

20

1 hearings that I have to be at at 1:30,  
2 so...

3 MR. FREED: Okay. I -- Your Honor,  
4 my expectation was this might take about  
5 half an hour if that's okay with Your  
6 Honor.

7 THE COURT: It takes as long as it  
8 takes, but I have -- I'm going to have a  
9 room full of people in about an hour.

10 MR. FREED: Okay. I will -- I will  
11 move it. I'll keep it moving, Your  
12 Honor.

13 BY MR. FREED:

14 Q. So is this -- is this document the notice of  
15 violation that you issued in August of 2018?

16 A. Yes.

17 Q. And this is based on an inspection that you made  
18 in August of 2018?

19 A. Yes.

1 was at the property. Now, if you want  
2 to cross-examine her when your turn  
3 comes, you can do that. But if she has  
4 been at your property and has seen the  
5 property, then she can testify that she  
6 was at your property.

7 The same thing would go for you if  
8 you were to have a photograph. I'd have  
9 to rely on your statement that the  
10 photographs were taken at your property.

11 So that's the basis for her  
12 testimony.

13 MR. EDWARDS: It's not my property.  
14 It's Wild River Enterprise.

15 THE COURT: The objection is  
16 overruled, so go ahead.

17 MR. FREED: Thank you, Your Honor.

18 BY MR. FREED:

19 Q. And with regard to the pictures, I noticed that  
20 the first one is dated August 1, 2019, correct?

21 THE COURT: Just a minute. Let me  
22 explore this.

23 You're saying, Mr. Edwards, that you  
24 don't own this property that you've been  
25 cited for?



1 MR. EDWARDS: No. I've been working  
2 for Wild River Enterprises.

3 THE COURT: Are you saying that the  
4 property is owned by a corporation?

5 MR. EDWARDS: Yes, sir.

6 THE COURT: And --

7 MR. EDWARDS: I work for them from  
8 time to time. I'm retired.

9 THE COURT: Just a moment.

10 Mr. Freed, has this issue been  
11 raised before about ownership of this  
12 property?

13 MR. FREED: It gets raised  
14 sometimes; it doesn't get raised other  
15 times. I'm prepared with evidence to  
16 address the issue.

17 THE COURT: Well, there are records  
18 that judicial notice can be taken of.

19 MR. FREED: I have them.

20 THE COURT: So is there a deed that  
21 shows that this property belongs to him  
22 or --

23 MR. FREED: I do not -- I do not  
24 have the deed. I do have the corporate  
25 records showing that Wild River

1           Enterprises is defunct.

2           THE COURT: Well, you -- I presume  
3           that there has been some attempt to  
4           determine ownership of the property?

5           MR. FREED: We believe, based on our  
6           MuniLogic and other data, that it's  
7           owned by Mr. Edwards. And in any event,  
8           it's clearly occupied by him.

9           THE COURT: Well, who is the record  
10          owner for purposes of the Recorder of  
11          Deeds and the Board of Assessment?

12          MR. FREED: I do not have the deed,  
13          Your Honor, but --

14          THE COURT: But wasn't there some  
15          attempt to determine who the owner was?  
16          I mean, it would only take going to the  
17          Recorder of Deeds. And I presume that  
18          there are tax bills that go out from the  
19          township. How can that be any -- how  
20          can there be some question about it?

21          MR. FREED: Because ownership is not  
22          a necessary element of the violations.

23          THE COURT: That's not what I am  
24          asking you right now. I'm asking you  
25          whether anyone took the time to check to

1 see who the record owner was.

2 THE WITNESS: Your Honor, under  
3 county records it says Gerald Edwards  
4 trading as, and then underneath it says  
5 Wild River Enterprises, LLC.

6 THE COURT: All right. Well, then  
7 there is something in the Recorder of  
8 Deeds Office.

9 THE WITNESS: Well, because  
10 Mr. Edwards recorded it that way. Two  
11 years ago we --

12 THE COURT: Just a moment. Where  
13 did you get that information that it was  
14 Gerald Edwards trading as Wild River  
15 Enterprises?

16 THE WITNESS: On Bucks County's  
17 records. As I stated --

18 THE COURT: And those records --

19 THE WITNESS: I cross-referenced --

20 MR. FREED: Your Honor, I have --

21 THE COURT: I mean, these are basic,  
22 these are as fundamental as it gets.

23 There is a -- there has to be a  
24 named person, and you know this,  
25 Mr. Freed. There has to be someone

1           whose name is on that -- on the records  
2           as the deed -- the record owner.

3           MR. FREED: Understood, Your Honor.  
4           But record ownership is not an  
5           element --

6           THE COURT: I'm not talking about  
7           whether it is an element or not, and you  
8           know that as well. Now, let's not joust  
9           about things that we know is not the  
10          issue.

11          I'm asking a very basic question.  
12          Now, we can -- after that question is  
13          answered, then you can move to the next  
14          question. But for right now I'd like to  
15          know who the record owner is on the  
16          deed. And if it's Gerald Edwards  
17          trading as Wild River Enterprises, then  
18          that should not be something that would  
19          be subject to discussion.

20          MR. FREED: Based on the county tax  
21          records --

22          THE COURT: Based on the --

23          MR. FREED: I don't have the deed,  
24          Your Honor.

25          THE COURT: Did I ask you if you had

1 the deed?

2 MR. FREED: I have -- we have the  
3 county tax records, which I do not --  
4 it's one of the things --

5 THE WITNESS: Your Honor, do you  
6 want me to look for it?

7 MR. FREED: I'm going to ask the  
8 witness to --

9 THE COURT: Well, you said that you  
10 checked the ownership, in your summary  
11 at the outset, that you checked the  
12 township records and that they  
13 coordinated with the county records.

14 MR. FREED: Yes. We have them --

15 THE COURT: Well, then there were  
16 county records that were looked at.

17 MR. FREED: Correct.

18 THE COURT: Well, then what were  
19 they that you looked at?

20 MR. FREED: Your Honor, the witness  
21 will pull it out here if we have a copy.

22 THE WITNESS: I do have it. I do  
23 have it.

24 MR. EDWARDS: Some of these  
25 photos you can't even --

1 THE COURT: Hold on.

2 (Pause in the proceedings.)

3 - - -

4 THE COURT: Do you have your tax  
5 records, something that shows who the  
6 tax bills are sent to?

7 MR. FREED: Yes, Your Honor.

8 THE COURT: And who is that?

9 MR. FREED: Gerald Edwards trading  
10 as Wild River.

11 THE COURT: All right. Go on.  
12 Let's not waste --

13 MR. FREED: There it is.

14 THE WITNESS: There it is. Sorry.  
15 How about if I give you this --  
16 this.

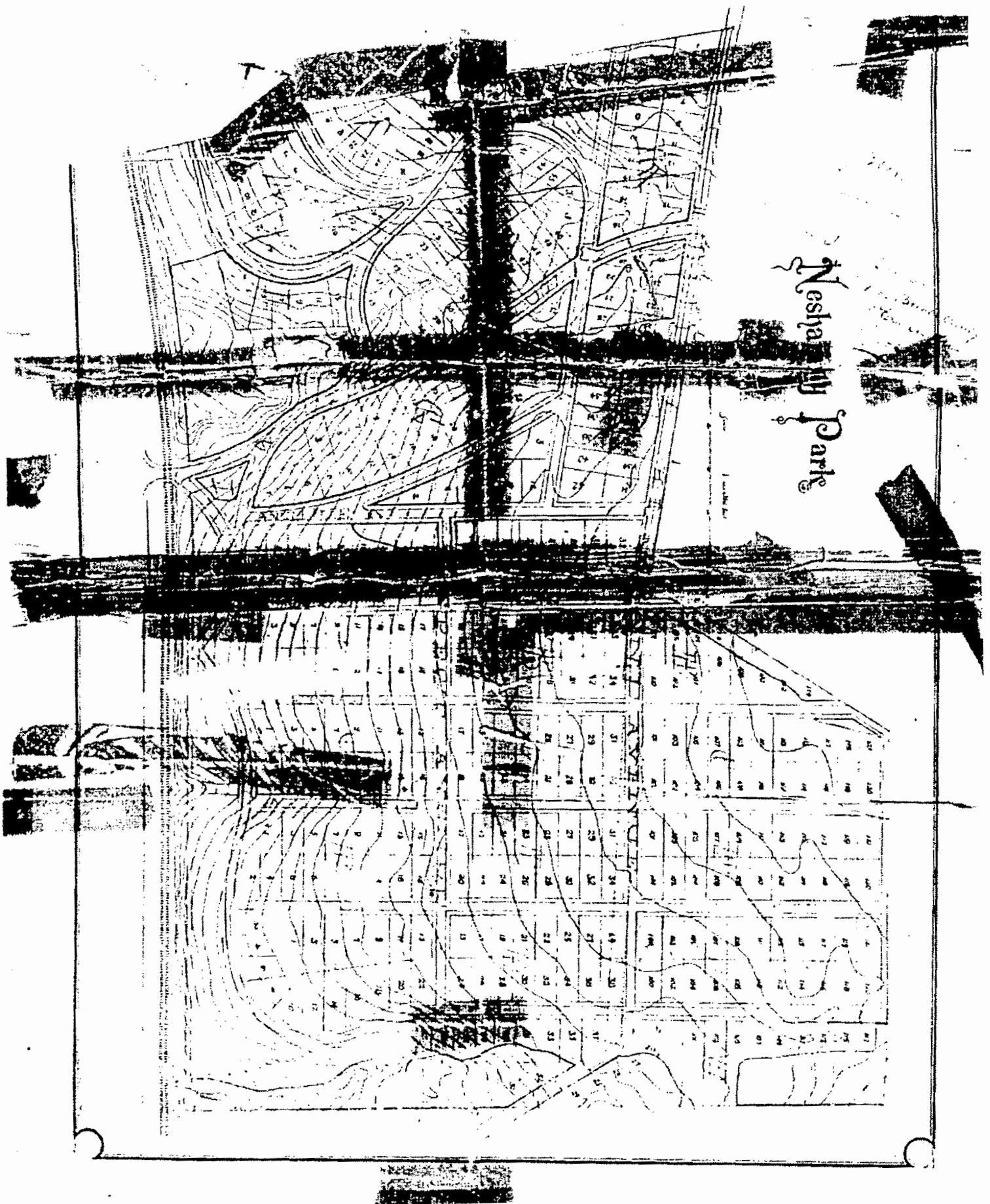
17 (A discussion was held off the record.)

18 - - -

19 THE COURT: I'm going to, for the  
20 moment, take judicial notice of the  
21 records of the Recorder of Deeds. And I  
22 will be checking -- and I'll check to  
23 confirm.

24 Let's move on. We really don't have  
25 -- we just don't have the time.







THE COURT: Let me ask one question.  
On C-9, driveways, you say undriveable.  
It does not meet township ordinances.  
And specifically what is it about the  
driveways or the sidewalks that make  
them out -- that takes them out of  
compliance with the township ordinances?

THE WITNESS: The surface is rough.

THE COURT: Is there an ordinance  
that says that driveways have to meet  
certain specifications?

THE WITNESS: Sidewalks, driveways,  
all sidewalks -- all sidewalks,  
walkways, and driveways, parking spaces  
in similar areas, shall be kept in a  
proper state of repair and maintained

1 free from hazardous conditions.

2 Two years ago I tried to enter this  
3 driveway in a four-wheel-drive vehicle,  
4 and I was -- I got stuck, myself and a  
5 police officer. So we had to try to  
6 maneuver the vehicle to get back down  
7 because of all the ruts.

8 And after it rains there's a lot of  
9 mud. As you can see in the pictures  
10 it's severely overgrown. It's just not  
11 driveable.

12 Now, to the -- there's another --

13 MR. FREED: I think that answers the  
14 question.

15 Your Honor, does that answer your  
16 question?

17 THE COURT: Not fully. When you  
18 have a driveway, is it supposed to be --  
19 is it supposed to have a certain rock or  
20 cinder base or be concrete or be  
21 blacktopped, or if it doesn't have those  
22 items that makes them nonhazardous, is  
23 there something about dirt driveways  
24 that -- or are dirt driveways not  
25 acceptable under the township ordinance?

1 Let's say the dirt driveway is level and  
2 without ruts or overgrown with  
3 vegetation.

4 THE WITNESS: It's not specifically  
5 spelled out if, you know, a hard product  
6 like blacktop, concrete. Some people  
7 use stone for a base in the driveway,  
8 but that's to keep it free from hazards,  
9 ruts.

10 THE COURT: So is it the ruts that  
11 makes it --

12 THE WITNESS: Hazardous.

13 THE COURT: -- that takes it out of  
14 compliance --

15 THE WITNESS: Correct.

16 THE COURT: -- because the ruts  
17 constitute a hazard?

18 THE WITNESS: Correct.

19 THE COURT: Is that what the  
20 ordinance says?

21 THE WITNESS: Well, it's says free  
22 from hazardous conditions. And in my  
23 opinion this driveway is a hazard.

24 BY MR. FREED:

25 Q. Does it also have to be in a proper state of

1 repair?

2 A. Well, it does, and it's not. It's rutted. It's  
3 overgrown. If one should try to walk it, you will be  
4 falling down.

5 THE COURT: Anything else that you  
6 want to bring to my attention with  
7 respect to the driveways and sidewalks?

8 THE WITNESS: No, Your Honor.

9 THE COURT: All right. Go on.

COMMONWEALTH OF PENNSYLVANIA  
COUNTY OF BUCKS



## Payment Determination Hearing Notice

Mag. Dist. No: MDJ-07-1-07  
MDJ Name: Honorable Daniel Baranoski  
Address: 142 Centre Street  
Pennel, PA 19047  
Telephone: 215-757-6761

Commonwealth of Pennsylvania  
v.  
Gerald Edwards

Gerald Edwards  
1652 Prospect Avenue  
Parkland, PA 19047

Docket No: MJ-07107-NT-0000077-2019  
Case Filed: 4/11/2019  
Comp/Cit #: R 2249661-1

*CP-09-SA 000401 2019*

Charge(s)	
LO § 500-2305 §§ B1 (Lead) Failure to Apply for Permits for Fences	
A Payment Determination Hearing has been scheduled for the above captioned case to be held on/at:	
Date: Thursday, June 13, 2019	Place: Magisterial District Court 07-1-07, Pennel 142 Centre Street Pennel, PA 19047 215-757-6761
Time: 8:45 AM	

Comments: Defendant failed to appear at hearing. Found guilty in absentia. 30 days to file an appeal. To file an appeal, contact the Clerk of Courts at (215) 348-6000. No collateral posted. Balance due. Thank you!

I, Honorable Daniel Baranoski, hereby state that on May 29, 2019, I sentenced you, Gerald Edwards, the above defendant, to pay a fine and/or costs in the amount of \$1,092.75 for violating the above charge(s). You have failed to pay the above fines and/or costs, and accordingly, I have set a payment determination hearing to determine your financial status due to your failure to pay the fines and costs which were imposed against you in the above captioned case. To date, you owe this court \$1,092.75 in fines, fees and costs.

At the hearing, you must appear and inform the court of any changes in your financial condition. The court may extend, accelerate, leave unaltered or impose imprisonment for non-payment of these fines and costs. If you fail to appear, a warrant may be issued for your arrest. If it is determined that you are financially able to pay, your case may be referred to a private collection agency.

At this hearing, you may have a right to be represented by an attorney. If you cannot afford an attorney and you qualify, one may be appointed for you. Please contact:

Bucks County Public Defenders Office  
100 N Main St.  
1st Floor  
Doylestown, PA 18901

for additional information regarding the appointment of an attorney.

Payment of fines and costs in FULL will excuse the necessity of your appearance at this hearing.

May 29, 2019

Date

Magisterial District Judge Daniel Baranoski



If you are disabled and require a reasonable accommodation to gain access to the Magisterial District Court and its services, please contact the Magisterial District Court at the above address or telephone number. We are unable to provide transportation. You can make case payments online through Pennsylvania's Unified Judicial System web portal. Visit the portal at <http://ujportal.pacourts.us> to make a payment.

This is a letter of tort; I Gerald Edwards is filling a law suite in U.S. court Easten division Philadelphia Pa. For damages to me. In the case cp-09-sa=0000318 2019. As the magistrate had no authority to send me, and the jail had none to admit me.

GERALD EDWARDS  
Gerald Edwards  
267 981 0709

Gerald Edwards

V.

u.s. 42-1983

Bucks County

Correction Facility

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In the case of cp-09-sa-318-2019 and cp-09-sa-104-2019. I am suing under u.s. 42-1983 the Bucks county correctional facility.

GERALD EDWARDS  
*Gerald Edwards*

267 981 0709

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